

FACILITY MANAGEMENT PLAN
PACIFIC WOOD TREATING - RBT SITE
ENVIRONMENTAL PROTECTION AGENCY ID. No. WAD 009036906

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5/17/85
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I. Background

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-This facility was discovered in 1983 during a visit to the PWT main plant site.

provide notification to
-The facility did not ~~notify~~ EPA in a timely manner.

landfill
-The facility claimed a ~~notation of a landfill~~ on the main plant Part A was for the off-site RBT site.

-PWT submitted a new Part A application for the RBT site.

-Waste was last received at the RBT site on January 25, 1983. Therefore, this facility escaped the 40 CFR Part 270 and 264 requirements until the Hazardous and Solid Waste Act of 1984 was signed, changing the date for determining regulated units from January 26, 1983, to July 26, 1982.

-This facility is now regulated and must comply with 40 CFR Parts 270 and 264.

-PWT prepared a closure and post-closure plan, dated July 15, 1983, which the WDOE conditionally approved through an order. According to PWT, the plan has also been revised since the order *was issued* by letter from WDOE.



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-The plan included several options for closure

-The unit was closed and certification was provided to WDOE and EPA.

-The unit depends upon local residential wells to satisfy the 40 CFR Part 265 groundwater monitoring requirements. These wells are located too far from the unit, water levels have never been checked, samples are collected after pneumatic tanks and filters, and one well shows signs of waste constituents.

-The closure of the unit generally appears to be satisfactory.

-PWT is balking verbally at spending more money to install proper groundwater monitoring and apply for the required permit.

-The Part B permit application was requested for the RRT site on April 9, 1985.

-A site visit and inspection were performed on 4/30/85.

-A Comprehensive Groundwater Evaluation Inspection has been performed on this facility, but the results have never been acted on.

-The waste is incinerator ash from the wood treating facility of PWT (K001).

June 7, 1983

Preliminary Groundwater Investigation Report submitted to EPA by PWT.

February 15, 1984

Certification of closure was submitted by PWT.

June 12, 1984

The RBT facility was inspected by Mike Brown, EPA.

April 3, 1985

WDOE requested Part B application.

April 9, 1985

EPA requested Part B application. Received by PWT on April 11, 1985. Part B application is due October 11, 1985.

April 30, 1985

EPA inspected the RBT site and met with PWT on the Part B call-in.

II. Environmental Significance

-The site received other waste. None of the waste was known or expected to be hazardous except the K001 listed waste from the PWT main plant site.

-The closure design appears to be sound except for the handling of leachate from the toe drain system, the poor groundwater detection system, ~~and~~ the potential for cracks at the periphery of the cover system, *and questions about complete removal of waste and waste residues from the old unit.*

-Toe drainage was discharged to a surface ditch at the main road. Drainage is now ^a ~~boiled~~ ^{out of} ~~from~~ the sump and dumped on the grounds.

-There are no known past practices at this site other than the unit of concern.

-There is some potential that waste residues remain outside of the closed unit (see April 30, 1985 inspection report) which could leach to groundwater.

265,223 Containment Systems SI
228 c/PC SI
280 c/PC Land treatment
310 c/PC Landfills

WA: 173-303-610 c/PC
173-303-645 GW

Sludges containing CCA residues from the inorganic treating process wastewaters were admixed c hog fuel and incinerated in the boiler.

-If the groundwater were contaminated, ~~groundwater~~ it could readily reach local resident's wells. This facility is located in a rural residential setting.

-This is not a commercial land disposal unit. It was operated by the company that generated the waste.

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III. Schedule for Final Determination

<i>EPA</i> Part B call-in letter received by facility (WDOE to have sent separate letter).	4/11/85
Part B meeting-inspection-initial Preliminary Site Investigation (PSI) with WDOE. Stressed importance of initiating aquifer characterization immediately.	4/30/85
Enforcement action (3007) taken, if appropriate.	6/15/85
Review continuing release information.	6/15/85
Finalize PSI (include 3008 order, if appropriate).	8/15/85
Part B due (including Exposure Assessment information, if closing land disposal facility).	10/11/85
Facility must certify compliance with Interim Status	11/8/85

Part B Completeness review due (complete or NOD).	12/11/85
Facility response to NOD due.	1/15/86
Final determination on Exposure Assessment, if closing as land disposal facility.	3/20/86
Issue 3008 order, with penalty, for incomplete Part B, if applicable (GWM information may not be complete by this time).	4/20/86
Facility Resubmits Part B as per order.	5/23/86
Part B complete.	8/4/86
EPA/WDOE issue Final Permit.	12/24/86
Final permit becomes effective.	1/24/87

IV. Comments and Concerns

PWT has stated that they will not submit a Part B application nor install the required groundwater monitoring system due to the past expenditures, the poor economic situation of the wood treating industry, and the cost of this effort.

For this reason, it is essential to follow up on the noncompliance with post-closure requirements. 40 CFR Part 265 requirements as expeditiously as practicable. The lack of expeditious follow up could create delays of 5 plus months in the permit process if PWT waits until the Part B due date to formally inform EPA that they will not submit Part B for post-closure.

There has been a tremendous delay in the enforcement of the 40 CFR Part 265, Subpart F requirements after the groundwater inspection. There is no evidence of action for these violations.